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Sender: "Perez Justo (GEAE CONTINENTAL)" <Justo.Perez@samerica.ae.ge.com>
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Subject: NPRM Docket no. FAA-I 99-5836; notice No. 99-09

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As suggested by the NPRM, the following is a comment and suggestion for Docket no. FAA-199-5835; notice No. 99-09, on specific subject area of Quality Assurance and Deviation Authority:

- Quality Assurance -

it would be very effective to emphasize the wording "independent Quality System" and include additional wording specifying that inspection personnel must report directly to and be assigned by the Chief Inspector of the Repair Station, not production management.

In order to prevent inspection findings and decision from being countermanded by production goals and schedules, include specific wording that a Chief Inspector must be at a level equal to that of a Director of Maintenance or above.

Specify that a Repair Station's Chief Inspector have a fiduciary relationship with the air carrier's own Chief Inspector or Inspection unit.

- Deviation Authority -

The FAA intends to relax the deviation authority. The major problem with deviations is identifying previous repairs on parts who's time since the deviation or records are none existing.

Many repair Stations and Air Carriers issue their own types / format of deviation documents and disregard the future upkeep of those document records. In many cases the deviation process of a Repair Station or Carrier is lost or changed as the companies are sold or staff changes.

Parts Brokers who purchase aircraft and engines are a major source of unidentified deviations. Brokers tend to have limited records after cannibalizing engines and aircraft. In typical scenarios, a Broker sends an engine to a Repair Station for teardown and inspection. Many of the parts are then tagged "serviceable" and enter the industry with no record of previous repair deviations. This also opens the door a bit wider for illegal repairs used on scrapped parts that make their way back into the industry.

Insignificant repairs can lead to other unforeseen problems. One particular problem within the industry is returning parts to service with previous repairs not found within the Manufacturer's Manuals. The Repair station that returns the part to service is left open to liability if the part fails and there is no record of the previous repair. This is the case with many Engine parts, which have previous deviation repairs that were accomplished years ago, of Carriers no longer in operation.

Deviation Authority should be controlled by one standard system and not by individual companies. Allowing individual companies to perform minor

deviations outside a standard system of accountability only encourages discontinuity of inspection standards and repairs outside the Manufacturer's indented design.- :

It would serve to improve the industries safety record, if repairs and 'inspections were held closer to the Manufactures Technical Publications rather than individual companies motivated by turn time and profit margins.

Additionally, the Carriers should be held responsible for any deviations accomplished on its fleet.

Justo J Perez

Continental QC Rep

Continental QC Rep



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